

11/10/06

teckcominco

PROGRESS REPORT NO. 4

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(via Email)
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FROM: Marko Adzic – Teck Cominco American Incorporated (TCAI)

CC: David Godlewski – TCAI (via Email)
Bruce Duncan – EPA, Region 10 (via Email)
David Charters – EPA, Headquarters (via Email)

DATE: November 10, 2006

RE: Upper Columbia River Remedial Investigation/Feasibility Study (RI/FS) -
Progress Report No. 4: Month Ending October 2006

Pursuant to Paragraph 39 of the June 2, 2006 Settlement Agreement (Agreement), the following is intended to provide a summary of the activities completed during the past month in compliance with the aforementioned Agreement. In addition, it is also intended to provide a summary of proposed activities to be carried out within the coming months.

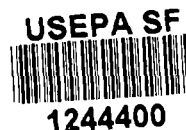
Table 1. Upper Columbia River Remedial Investigation/Feasibility Study Summary of On-Going and Planned Activities

Task No.	Task Description	Status	Issues	Estimated Completion Date ¹
1.	2005 Field Data Transfer	Complete	None to report at this time	<u>July 31, 2006</u>
2.	Technical Memorandum ²	Complete	None to report at this time	<u>October 27, 2006</u>
3.	Draft RI/FS Work Plan	On-going	None to report at this time	December 28, 2006
4.	Sampling and Analysis Plan(s)	On-going	None to report at this time	February 26, 2007
5.	Health and Safety Plan	On-going	None to report at this time	February 26, 2007

Notes: 1. Dates that have been underlined represent the actual day that the respective deliverable was submitted to EPA as per Paragraph 80 of the Agreement.
2. As outlined within the Agreement the technical memorandum outlines and described the Risk-Based Remedial Objectives for the Ecological Risk Assessment. Remedial objectives for the protection of human health will be prepared by EPA and submitted under separate cover at a later date.

On October 17th a meeting to present and discuss the risk management-based action objectives (RMAOs) for the ecological risk assessment was conducted in Spokane, Washington (WA). In addition and as outlined within the agenda (distributed to participating parties on October 11, 2006), the meeting was also intended as an opportunity to distribute the table of contents for the draft work plan being developed by TCAI. It was not intended to be a technical discussion nor as an opportunity to introduce specifics such as the site conceptual model or data quality objectives.

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However, expectations from participating parties were that discussions would be more technical and that TCAI would present and discuss details associated with 2007 sampling programs. Notwithstanding the differences in expectations, TCAI did receive valuable input with respect the RMAO technical memorandum. In addition, it was made clear by participating parties that as opposed to having technical working sessions to discuss potential programs/designs prior to the submittal of deliverables outlined within Section V of the Agreement, TCAI is to prepare and submit the respective deliverable to which participating parties will review and provide written comment(s). As a result, it is not anticipated that any additional meetings with participating parties will be conducted until the draft work plan has been submitted.

In addition to the October 17th meeting, a meeting was also conducted on the 19th. The purpose of the meeting was to introduce EPA's technical team for the human health risk assessment. At that time it was acknowledged that a draft work plan for human health would not be submitted to participating parties until 2007. Presently it remains uncertain how this may adversely affect the project as efforts to complete the work plan for ecological receptors are scheduled for this year.

We wish to confirm that efforts to complete the draft RI/FS work plan are on-going and will address aspects mentioned within the Agreement. In general, these activities include preparing a comprehensive review and summary of existing data in terms of physical and chemical characteristics for chemicals of potential concern; and their distribution within environmental media at the UCR site. This information is being used to assess, identify, and prioritize future sampling events. In addition and in parallel with the draft work plan, a screening level risk assessment for ecological receptors is being conducted and will be submitted under separate cover. We wish to confirm that preliminary screening activities are also being incorporated into the draft work plan, but are limited to media/receptors evaluated in 2005. The UCR is complex and as such, screening of ecological risks will be an iterative process of which results will be used to make key decisions and guide subsequent sampling programs.

In addition to the above mentioned, TCAI's technical team will also be developing sampling and analysis plan(s) to be implemented in the upcoming season. As outlined within Table 1, the first sampling and analysis plan will be submitted to EPA no later than February 26, 2007. Details of project phasing will be discussed within the draft RI/FS work plan.

Should you have any questions or require any additional information, please do not hesitate to contact me at 509-892-2585.